

# Commonwealth of Massachusetts

Executive Office of Health and  
Human Services



## Chapter 257 of the Acts of 2008

**Stakeholder and Provider Engagement Session:  
Community Based Flexible Supports**

**December 13, 2013**

[www.mass.gov/hhs/chapter257](http://www.mass.gov/hhs/chapter257)  
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# Agenda



## ❖ Chapter 257 of the Acts of 2008 – Timeline and Key Milestones

### ❖ Stakeholder Discussion

- Rate Models
- Specialty Services
- Core Services
- Non-Rehab Services
- Group Living Environments
- Operational Considerations

### ❖ Next Steps



## Chapter 257 of the Acts of 2008 Regulates Pricing for the POS System



- Chapter 257 places authority for determination of Purchase of Service reimbursement rates with the Secretary of Health and Human Services under MGL 118E. The Center for Health Information and Analysis (CHIA) provides staffing and support for the development of Chapter 257 pricing.
- Chapter 257 requires that the following criteria be considered when setting and reviewing human service reimbursement rates:
  - Reasonable costs incurred by efficiently and economically operated providers
  - Reasonable costs to providers of any existing or new governmental mandate
  - Changes in costs associated with the delivery of services (e.g. inflation)
  - Substantial geographical differences in the costs of service delivery



# Community Based Flexible Supports: Timeline



## Proposed Timeline

### May 2013

Survey Results; Contract Data

### Summer 2013

Model Development

Rate considerations

Input and Questions

### Fall 2013

Regional Dialogues

Incorporating Stakeholder Input

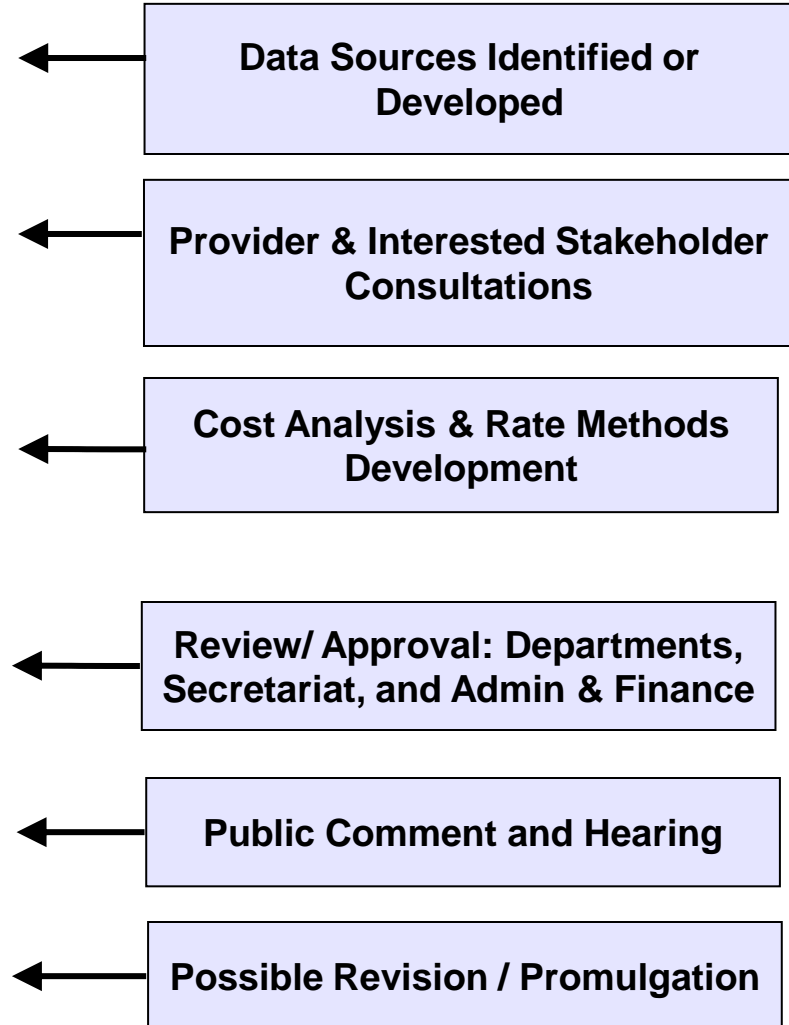
### Winter 2013-14

Rates shared with public

### Winter 2014

### Spring 2014

## CBFS Pricing Analysis, Rate Development, Approval, and Hearing Process





## Community Based Flexible Supports: Feedback – November 18<sup>th</sup> Sessions



- EOHHS and DMH held two very well-attended provider sessions on Monday, November 18<sup>th</sup>. Verbal and written feedback as a result of the sessions was extensive – thank you.
- Overall, the proposed construct for CBFS rates was well-received and deemed to generally match the experience of providers.
- There were some specific feedback items, many of which are incorporated to some extent in updated models to be discussed today. Those include –
  - Office space
  - Transportation costs
  - Consulting
  - GLE Staffing Levels



# Community Based Flexible Supports: Proposed Layers of Care



Other Community-Based Services

**Non-Rehab CBFS Services**

**Core CBFS Services**

**Group Living Environments (GLEs)**

**Specialty  
Services**



# Community Based Flexible Supports: Specialty Services



DMH has established Specialty Models based on the following categories of service delivery:

- Clinically Intensive
- Medically Intensive (MiMi)
- Behavioral and Behavioral Assessment
- Fire Safety
- DBT



# Specialty Programs – Clinical and Medical Models



## CBFS Clinically Intensive Cont. Care Step Down Model

	FTE	Expense
<b>Management</b>		
Supervising Professional	2.00	10%
<b>Medical and Clinical</b>		
LPHA	1.00	5%
<b>Direct Care</b>		
DC Blended (DC I + II + III)	15.60	45%
Relief	2.40	6%
<b>Total Program Staff</b>	<b>21.07</b>	<b>66%</b>
<b>Expenses</b>		
Tax and Fringe	xx.xx%	14%
<b>Total Compensation</b>		<b>80%</b>

[Consulting Services]	Hour	
Psychologist/Psychiatrist	52.00	TBD
Occupancy		6%
Food		2%
Transportation		1%
Other Expenses		0.25%
<b>Total Reimb excl M&amp;G</b>		<b>90%</b>

Admin. Allocation      xx.xx%      10%

**TOTAL**      100%

CAF:      x.xx%

UNIT RATE:      TBD

## CBFS Medical Speciality Model

	FTE	Expense
<b>Management</b>		
Supervising Professional	1.00	8%
<b>Medical and Clinical</b>		
RN	1.00	10%
Certified Nursing Assistant (CNA)	3.00	17%
<b>Direct Care</b>		
DC Blended (DC I + II)	6.00	27%
Relief	0.92	4%
<b>Total Program Staff</b>	<b>11.92</b>	<b>65%</b>
<b>Expenses</b>		
Tax and Fringe	xx.xx%	14%
<b>Total Compensation</b>		<b>79%</b>

[Consulting Services]	Hour	
Occupational Therapist	26.00	TBD
LPHA	26.00	TBD
Occupancy		7%
Food		2%
Transportation		2%
Other Expenses		0.29%
<b>Total Reimb excl M&amp;G</b>		<b>90%</b>

Admin. Allocation      xx.xx%      10%

**TOTAL**      100%

CAF:      x.xx%

UNIT RATE:      TBD





# Specialty Programs – Behavioral Models



CBFS Intensive Behavioral Model		
	FTE	Expense
<b>Management</b>		
Supervising Professional	1.00	8%
<b>Direct Care</b>		
DC Evening Supervisor	1.00	6%
DC Blended (DC I + II + III)	10.00	44%
Relief	1.54	6%
<b>Total Program Staff</b>	<b>13.54</b>	<b>64%</b>
<b>Expenses</b>		
Tax and Fringe	xx.xx%	14%
<b>Total Compensation</b>		<b>78%</b>
<hr/>		
<b>[Consulting Services]</b>	<b>Hour</b>	
Psychologist/Psychiatrist	52.00	TBD
Occupancy		7%
Food		2%
Transportation		2%
Other Expenses		0.29%
<b>Total Reimb excl M&amp;G</b>		<b>90%</b>
Admin. Allocation	xx.xx%	10%
<b>TOTAL</b>		<b>100%</b>
<b>CAF:</b>	x.xx%	
<b>UNIT RATE:</b>		<b>TBD</b>

CBFS Comm. Behavioral Assessment Model		
	FTE	Expense
<b>Management</b>		
Supervising Professional	2.20	12%
<b>Medical and Clinical</b>		
Psychologist	0.50	10%
LPHA	0.75	4%
LPN	0.40	2%
<b>Direct Care</b>		
DC Blended (DC I + II + III)	9.20	29%
Relief	1.42	4%
<b>Total Program Staff</b>	<b>13.47</b>	<b>60%</b>
<b>Expenses</b>		
Tax and Fringe	xx.xx%	13%
<b>Total Compensation</b>		<b>73%</b>
<hr/>		
<b>[Consulting Services]</b>	<b>Hour</b>	
Psychologist/Psychiatrist	208.00	TBD
Occupancy		10%
Food		3%
Transportation		1%
Other Expenses		0.41%
<b>Total Reimb excl M&amp;G</b>		<b>90%</b>
Admin. Allocation	xx.xx%	10%
<b>TOTAL</b>		<b>100%</b>
<b>CAF:</b>	x.xx%	
<b>UNIT RATE:</b>		<b>TBD</b>



# Specialty Programs – Fire Safety and DBT



## CBFS Fire Safety Model

	FTE	Expense
<b>Management</b>		
Supervising Professional	1.00	8%
<b>Medical and Clinical</b>		
Psychologist	0.12	4%
LPHA	0.05	0.4%
Occupational Therapist	0.12	1%
LPN	0.20	2%
<b>Direct Care</b>		
DC Evening Supervisor	0.50	3%
DC Blended (DC I + II + III)	8.62	42%
<i>Relief</i>	1.33	6%
<b>Total Program Staff</b>	<b>11.94</b>	<b>66%</b>
<b>Expenses</b>		
Tax and Fringe	xx.xx%	15%
<b>Total Compensation</b>		<b>81%</b>
Occupancy		5%
Food		2%
Transportation		2%
Other Expenses		0.22%
<b>Total Reimb excl M&amp;G</b>		<b>90%</b>
Admin. Allocation	xx.xx%	10%
<b>TOTAL</b>		<b>100%</b>
CAF:	x.xx%	
UNIT RATE:		TBD

## CBFS DBT Intensive Model

	FTE	Expense
<b>Management</b>		
Supervising Professional	1.00	7%
<b>Medical and Clinical</b>		
LPHA	1.50	9%
LPN	0.25	2%
<b>Direct Care</b>		
DC Blended (DC I + II + III)	10.50	40%
Vocational Coordinator	0.20	1%
Peer & Family Specialist	0.20	1%
<i>Relief</i>	1.62	5%
<b>Total Program Staff</b>	<b>15.27</b>	<b>65%</b>
<b>Expenses</b>		
Tax and Fringe	xx.xx%	14%
<b>Total Compensation</b>		<b>79%</b>
Occupancy		7%
Food		2%
Transportation		2%
Other Expenses		0.30%
<b>Total Reimb excl M&amp;G</b>		<b>90%</b>
Admin. Allocation	xx.xx%	10%
<b>TOTAL</b>		<b>100%</b>
CAF:	x.xx%	
UNIT RATE:		TBD



# Community Based Flexible Supports: Proposed Layers of Care



Other Community-Based Services

**Non-Rehab CBFS Services**

**Core CBFS Services**

**Group Living Environments (GLEs)**

**Specialty  
Services**



# Community Based Flexible Supports: CBFS Layers – Core Services



## CBFS Core Services (Outreach) Model

Beds: 100		Enrollment Days: 36,500	
	FTE	Expense	
Management			
Program Director	1.00	3%	
Assistant Director (LICSW level)	1.00	3%	
Program Functional Manager	0.35	1%	
Medical and Clinical			
Psychiatrist	0.05	1%	
LPHA	4.00	11%	
RN	2.00	8%	
Substance Abuse Counselor	2.00	5%	
Direct Care			
DC Blended (DC I + II + III)	10.00	17%	
Housing Coordinator	0.50	1%	
Vocational Coordinator	1.00	2%	
Peer & Family Specialist	2.50	4%	
Relief	0.75	1%	
Support			
Prog Secretarial / Clerical	1.00	2%	
Total Program Staff	26.15	60%	

## CBFS Core Services (Cont'd)

<b>Expenses</b>		
Tax and Fringe	xx.xx%	13%
<b>Total Compensation</b>		<b>73%</b>
<hr/>		
<b>[Consulting Services]</b>	<b>Hour</b>	<b>Expense</b>
Occupational Therapy	55.00	TBD
Psychologist (Ph. D)	55.00	TBD
<b>Total Consulting Services</b>		<b>TBD</b>
<hr/>		
Office Space		9%
Staff Training		1%
Transportation		2%
Incidental Medical/Medicine/Pharmacy		0.1%
Client Personal Allowances		0.1%
Other Expenses		2%
Direct Admin Expenses		3%
		17%
<b>Total Reimb excl M&amp;G</b>		<b>90%</b>
<hr/>		
Admin. Allocation	xx.xx%	10%
<hr/>		
<b>TOTAL</b>		<b>100%</b>
<b>CAF:</b>	x.xx%	\$xx.xx
<b>UNIT RATE:</b>		<b>TBD</b>



# Community Based Flexible Supports: CBFS Layers – Non-Rehab Services



## Non-Rehab includes:

- Documentation is reflective of no rehab option requirements (based on assessment by LPHA), service notes, etc.
- Emphasis on support anticipated

CBFS Non-Rehab Model Budget			
Beds: 100		Enrollment Days: 36,500	
		FTE	Expense
<b>Management</b>			
Assistant Director (LICSW level)		1.00	9%
<b>Medical and Clinical</b>			
RN		0.10	1%
<b>Direct Care</b>			
DC Blended (DC I + II + III)		5.00	26%
Housing Coordinator		0.25	1%
Peer & Family Specialist		2.00	10%
Relief		0.38	2%
<b>Support</b>			
Prog Secretarial/Clerical		0.50	3%
<b>Total Program Staff</b>		<b>9.23</b>	<b>51%</b>
<b>Expenses</b>			
Tax and Fringe	xx.xx%		11%
<b>Total Compensation</b>			<b>62%</b>
Office Space			10%
Staff Training			1%
Transportation			2%
Incidental Medical/Medicine/Pharmacy			0.3%
Client Personal Allowances			0.3%
Other Expenses			6%
Direct Admin Expenses			9%
			<b>28%</b>
<b>Total Reimb excl M&amp;G</b>			<b>90%</b>
Admin. Allocation	xx.xx%		10%
<b>TOTAL</b>			<b>100%</b>
<b>CAF:</b>	x.xx%		
<b>UNIT RATE:</b>			<b>TBD</b>



# Community Based Flexible Supports: GLE Staffing Patterns



The chart below shows the change in staffing pattern as GLE capacity increases.

## Staffing Patterns in the GLE

### Capacity:

### Direct Care Staff

Site Manager  
Direct Care (DC I + II)  
Relief

4 to 6	7 to 9	10 to 12	13+
1.00	1.00	1.00	?
5.60	6.50	8.75	?
0.86	1.00	1.35	?

### Benchmark FTEs



# Community Based Flexible Supports: CBFS Layers – GLEs



## Group Living Environments (GLEs) include:

- Rate provides for staffing supervision costs alone – would also bill for Core Services for additional rehab, support and programming.
- Rates will be developed for GLEs at the capacity levels:
  - 4-6 beds,
  - 7-9 beds and
  - 10-12 beds
  - 13+

### CBFS Standard GLE Model Budget

Beds: 5		Enrollment Days: 1,825	
		FTE	Expense
<b>Direct Care</b>			
Site Manager		1.00	11%
DC Blended (DC I + II)		5.60	43%
Relief		0.86	6%
<b>Total Program Staff</b>		<b>7.46</b>	<b>59%</b>
<b>Expenses</b>			
Tax and Fringe	xx.xx%		13%
<b>Total Compensation</b>			<b>72%</b>
Occupancy			10%
Food			4%
Transportation			3%
Other Expenses			0.4%
			18%
<b>Total Reimb excl M&amp;G</b>			<b>90%</b>
Admin. Allocation	xx.xx%		10%
<b>TOTAL</b>			<b>100%</b>
<b>CAF:</b>	x.xx%		
<b>UNIT RATE:</b>			<b>TBD</b>



## Community Based Flexible Supports: Administrative Services Organization (ASO)



- DMH is revisiting the concept of establishing an Administrative Services Organization (ASO) to manage state and federal subsidies for DMH clients when no other CBFS services are indicated.
- A third-party is needed to sign for the subsidies, and CBFS providers have been performing this function on behalf of ~350 CBFS consumers, or 3% of the overall CBFS population.
- The ASO is anticipated to perform the subsidy management work. DMH is currently working to further refine the function and timeframe for implementation.





## Community Based Flexible Supports: CBFS Layers – Operational Considerations



Many operational questions were raised during the provider sessions on November 18<sup>th</sup> regarding the proposed CBFS structure. Those are still under consideration, and include:

- How will new CBFS enrollees be managed?
- How will enrollees transition to/from different layers within CBFS?
- How will status changes be communicated with Providers?
- How long will a person continue with no “R” days before they are moved to Non-Rehab layer?
- When will a person’s condition warrant moving from Non-Rehab to Core Services and vice versa?
- How will contract rent be reflected on UFR; will it mean a separate Schedule B entry?



## Community Based Flexible Supports: Next Steps



Next Provider and Stakeholder Input Session to be held:

February 2014  
Worcester Recovery Center and Hospital  
TBD

Today's meeting materials will be posted on Chapter 257 website:  
[www.mass.gov/hhs/chapter257](http://www.mass.gov/hhs/chapter257)

Comments and questions regarding Chapter 257 process can be sent to:  
[EOHHSPOSPolicyOffice@state.ma.us](mailto:EOHHSPOSPolicyOffice@state.ma.us)